### UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

RAVGEN, INC.,

Plaintiff,

Civil Action No. 1:20-cv-00692-ADA

v.

**JURY TRIAL DEMANDED** 

NATERA, INC. AND NSTX, INC.,

Defendants.

## JOINT MOTION FOR ENTRY OF PROPOSED AMENDED SCHEDULING ORDER

Plaintiff, Ravgen, Inc. ("Ravgen") and Defendants Natera, Inc. and NSTX, Inc. (collectively "Natera") respectfully submit this Motion for Entry of Proposed Amended Scheduling Order as follows:

Parties' Proposed Date	Event
June 19, 2023	Deadline for production of new documents
July 27, 2023	Close of supplemental fact discovery
Aug. 10, 2023	Deadline for supplementation of opening expert reports
Sept. 14, 2023	Deadline for supplementation of rebuttal expert reports
Oct. 6, 2023	Close of supplemental expert discovery
Oct. 18, 2023	Deadline for opening dispositive and <i>Daubert</i> motions
Nov. 1, 2023	Deadline for responses to dispositive and <i>Daubert</i> motions
Nov. 8, 2023	Deadline for replies in support of dispositive and <i>Daubert</i> motions
Nov. 8, 2023	Serve Pretrial Disclosures (jury instructions, exhibit list, witness lists, discovery and deposition designations).
Nov. 9, 2023	Parties to advise the Court if conflicts with the trial date still exist and the specific nature of the conflicts
Nov. 15, 2023	Serve objections to pretrial disclosures/rebuttal disclosures.

Parties' Proposed Date	Event
Nov. 21, 2023	Serve objections to rebuttal disclosures; File Motions <i>in limine</i>
Nov. 30, 2023	File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibit lists, witness lists, discovery and deposition designations);
	File oppositions to motions in limine.
Dec. 1, 2023	File Notice of Request for Daily Transcript or Real Time Reporting. If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e-mail the Court Reporter, Kristie Davis at <a href="mailto:kmdaviscsr@yahoo.com">kmdaviscsr@yahoo.com</a> .  Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i> .
Dec. 4, 2023	File joint notice identifying remaining objections to pretrial disclosures and disputes on motions <i>in limine</i> .
Dec. 11, 2023	Final Pretrial Conference
Jan. 8, 2024	Jury Selection/Trial

Dated: June 6, 2023

#### /s/ Amanda L. Major

Stephen M. Hash (Texas Bar No. 24012800) Samoneh Schickel (Texas Bar No. 24097911) Alexander T. Piala (Texas Bar No. 24110223) MCDERMOTT, WILL & EMERY LLP 303 Colorado Street, Suite 2200 Austin, Texas 78701-4078

Telephone: (512) 726-2600 Fax: (512) 532-0002 shash@mwe.com

apiala@mwe.com

sschickel@mwe.com

Elizabeth Durham Flannery Texas Bar No. 24045815

Michael A. Hawes (pro hac vice)

Texas Bar No. 24010761 BAKER BOTTS L.L.P. 910 Louisiana Street

Houston, Texas 77002-4995 Telephone: (713) 229-1234 Facsimile: (713) 229-1522 Liz.flannery@bakerbotts.com michael.hawes@bakerbotts.com

Michael J. Summersgill (pro hac vice) michael.summersgill@wilmerhale.com

WILMER CUTLER PICKERING HALE AND DORR LLP

60 State Street

Boston, Massachusetts 02109

Tel: (617) 526-6000 Fax: (617) 526-5000

Amanda L. Major (pro hac vice) amanda.major@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 2100 Pennsylvania Avenue NW Washington, DC 20037

Tel: (202) 663-6000 Fax: (202) 663-6363

ATTORNEYS FOR NATERA, INC. AND NSTX, INC.

#### Respectfully submitted,

#### /s/ Kerri-Ann Limbeek

Deron R. Dacus

State Bar No. 00790553

THE DACUS FIRM, P.C.

821 ESE Loop 323, Suite 430

Tyler, TX 75701

Phone: (903) 705-1117 Fax: (903) 581-2543

ddacus@dacusfirm.com

John M. Desmarais (pro hac vice)

Kerri-Ann Limbeek (pro hac vice)

Brian D. Matty (pro hac vice)

Benjamin N. Luehrs (State Bar No. 440317)

Kyle G. Petrie (pro hac vice) Joze Welsh (pro hac vice) Jun H. Tong (pro hac vice)

Deborah J. Mariottini (pro hac vice)

#### **DESMARAIS LLP**

230 Park Avenue

New York, NY 10169

Telephone: 212-351-3400

Facsimile: 212-351-3401

jdesmarais@desmaraisllp.com

klimbeek@desmaraisllp.com

bmatty@desmaraisllp.com

bluehrs@desmaraisllp.com

kpetrie@desmaraisllp.com

jwelsh@desmaraisllp.com

jtong@desmaraisllp.com

dmariottini@desmaraisllp.com

Attorneys for Plaintiff Ravgen, Inc.

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service were served with a copy of the foregoing via the Court's ECF/CM system on June 6, 2023.

/s/ Kerri-Ann Limbeek
Kerri-Ann Limbeek